

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LEONARDO SEGATT,))
)	
Plaintiff,)	No.: 07 CV 11413 (WHP)
)	
- against -)	ECF Case
)	
GSI HOLDINGS CORP., WILLIAM J. BRANCH,)	
CHARLESBANK EQUITY FUND V, LIMITED)	PARTIES' JOINT
PARTNERSHIP, CB OFFSHORE EQUITY FUND)	<u>DISCOVERY PLAN</u>
V, L.P., CHARLESBANK EQUITY COINVEST-)	
MENT FUND V, LIMITED PARTNERSHIP,)	
CHARLESBANK COINVESTMENT PARTNERS,)	
LIMITED PARTNERSHIP, CHARLESBANK)	
EQUITY FUND V GP, LIMITED PARTNERSHIP)	
and CHARLESBANK CAPITAL PARTNERS, LLC,)	
)	
Defendants.)	

Plaintiff hereby files on behalf, and with the consent, of counsel for all parties the following joint discovery plan (for the convenient reference of the Court and the parties, the dates scheduled by the Court's orders dated January 9, 2008 and March 14, 2008 are shown along side the discovery plan entries):

Date	Pretrial Schedule Based on Court's Orders Dated Jan. 9, 2008 and March 14, 2008	Joint Discovery Plan
March 28, 2008	Defendants file and serve their motions to dismiss	
March 28, 2008	Parties file a Joint Discovery Plan.	
April 4, 2008		Parties' Rule 26(a) exchange of documents and information

Date	Pretrial Schedule Based on Court's Orders Dated Jan. 9, 2008 and March 14, 2008	Joint Discovery Plan
April 4, 2008	Pretrial conference with the Court at 11:30 am to discuss pretrial schedule (this conference may have been superseded by the March 14, 2008 conference)	
April 14, 2008		Parties serve their initial demands for additional written discovery (e.g., interrogatories, evidentiary documents, admissions)
April 18, 2008	Plaintiff files and serves his opposition to the motions to dismiss	
April 28, 2008	Defendants file and serve their replies on their motions to dismiss	
May 9, 2008	Argument of Defendants' motions to dismiss at 10:30 am	
May 14, 2008		Responses due to initial demands for additional written discovery
June 13, 2008		Parties serve initial notices for depositions
September 15, 2008	Discovery to be completed	
October 17, 2008	Parties file joint pretrial order in accord with the Court's individual practices	
October 31, 2008	Final pretrial conference at 10:30am	

Dated: New York, New York
March 27, 2008

LAW OFFICES OF MARK P. ZIMMETT

By: 
Mark P. Zimmett (MZ 8735)

Attorneys for Plaintiff
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So Ordered:

U.S.D.J.